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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 UNITED STATES OF AMERICA,) NO. CR-17-104 SI

14 Plaintiff,)

15 v.)

16 ANDRE MITCHELL BROWN AND JAVIER)
RAYMOND JENKINS,)

17 Defendants.)
18

STIPULATION TO EXCLUDE TIME AND
~~PROPOSED~~ ORDER

19
20 **STIPULATION**

21 IT IS HEREBY STIPULATED by and between the parties to this action, as stated on the record
22 at the parties' first appearance before the District Court on April 7, 2017, that the time between April 7,
23 2017, and May 12, 2017, be excluded under the Speedy Trial Act pursuant to 18 U.S.C. §§
24 3161(h)(7)(A) and (h)(7)(B). Excluding time until May 12, 2017 will allow defense counsel the
25 reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
26 See 18 U.S.C. § 3161(h)(7)(B)(iv).

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1 IT IS SO STIPULATED.

2 DATED: April 7, 2017

BRIAN J. STRETCH
United States Attorney

3
4 /s/
KATHERINE M. LLOYD-LOVETT
5 Assistant United States Attorney

6 DATED: April 7, 2017

7
8 /s/
ELLEN LEONIDA
9 Counsel for Defendant ANDRE BROWN

10 DATED: April 7, 2017


11
12 /s/
SUZANNE MORRIS
13 Counsel for Defendant JAVIER JENKINS

14
15 ~~PROPOSED~~ ORDER

16
17 As explained on the record during the April 7, 2017, initial appearance before this Court, the
18 Court finds that the exclusion of the period from April 7, 2017, to May 12, 2017, from the time limits
19 applicable under 18 U.S.C. § 3161, is warranted; that the ends of justice served by the continuance
20 outweigh the interests of the public and the defendant in the prompt disposition of this criminal case;
21 and that the failure to grant the requested exclusion of time would deny defense counsel the reasonable
22 time necessary for effective preparation, taking into account the exercise of due diligence, and would
23 result in a miscarriage of justice. *See* 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

24 IT IS SO ORDERED.

25 DATED: 4/10/2017

26 
HON. SUSAN ILLSTON
United States District Judge